

21-0015

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Jamiee L. DeSimone	20-20487 GLT
	Chapter 13 Proceeding
Debtor(s)	Hearing Date: 05/19/2021 at 10:00 am
Freedom Mortgage Corporation	
Movant	
v. Jamiee L. DeSimone and Ronda J. Winnecour, Esquire	
Respondents	

**CERTIFICATE OF NO RESPONSE
TO MOTION TO APPROVE MORTGAGE FORBEARANCE**

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading to the Motion filed on 04/20/2021 has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Hearing, objections to the Motion were to be filed and served no later than **05/07/2021**.

It is hereby respectfully requested that the Order attached to the Motion be entered by the Court.

Respectfully submitted,
POWERS KIRN, LLC

By: /s/ Jill Manuel-Coughlin
By: Jill Manuel-Coughlin
Attorney ID # 63252
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Attorney for Movant
DATED: May 12, 2021

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CERTIFICATION OF SERVICE AND NOTICE

JILL MANUEL-COUGHLINE, counsel for Freedom Mortgage Corporation, hereby certifies that a copy of the foregoing Certificate of No Response was served upon the following persons by electronic notification or regular first-class mail, postage prepaid, on May 12, 2021:

Served Electronically:

Christian M. Rieger, Esquire
2403 Sidney Street, Suite 250B
Pittsburgh, PA 15203
Attorney for Debtor(s)

Ronda J. Winnecour, Esquire
600 Grant Street, Suite 3250
Pittsburgh PA 15219
Trustee

Served Via 1st Class Mail:

Jamiee L. DeSimone
371 Greene Drive
Clairton PA 15025
Debtor

Justin F. DeSimone
371 Greene Drive
Clairton, PA 15025
Co-Debtor

POWERS KIRN, LLC

By: /s/ Jill Manuel-Coughlin

By: Jill Manuel-Coughlin

Attorney ID # 63252

Eight Neshaminy Interplex, Suite 215

Trevose, PA 19053

Telephone: 215-942-2090

Facsimile: 215-942-8661

E-mail: Jill@powerskirm.com

Attorney for Movant

DATED: May 12, 2021